

September 3, 2024

VIA ECF

Hon. Jennifer L. Rochon
United States District Court, S.D.N.Y.
500 Pearl Street, Room 1010
New York, NY 10007

RE: *Doolittle v. Bloomberg L.P.*, No. 22-CV-09136 (JLR)
Joint Letter Motion to File Documents Under Seal

Dear Judge Rochon:

Pursuant to Section 4(B)(i) of Your Honor's Individual Rules of Practice in Civil Cases, Standing Order 19-MC-00583, and Section 6 of the Southern District of New York Electronic Case Filing Rules & Instructions, the parties seek leave to file under seal an unredacted version of their forthcoming joint letter and an exhibit to the same. First, the parties seek to seal in full Exhibit 2, an expert report containing a psychiatric assessment of Ms. Doolittle, and to redact references in the joint letter to the contents of that report. Exhibit 2 was designated as "Confidential – Attorney's Eyes Only" under the parties' Protective Order (Dkt. 55) and contains medical information categorized as "sensitive information" under Section 4(B)(i) of Your Honor's Individual Rules. Second, the parties seek to seal references in the joint letter to medical information about Mr. Crumpton, also categorized as "sensitive information" under Section 4(B)(i) of Your Honor's Individual Rules. Third, the parties seek to redact a reference in the joint letter to information concerning Mr. Crumpton's employment history, also categorized as "sensitive information" under Section 4(B)(i) of Your Honor's Individual Rules.

While Rule 4(B)(i) of Your Honor's Individual Rules states that Court approval is not required to seal or redact information about an individual's medical or employment history, the e-filing system appears to require a letter motion seeking approval to submit a sealed filing. As such, the parties respectfully request that the Court grant leave to file the aforementioned documents under seal.

Respectfully submitted,

/s/ Daniel Kotchen

Daniel Kotchen

Amanda Burns

Counsel for Ms. Doolittle

/s/ Anna Aguilar

Anna Aguilar

Counsel for Mark Crumpton


/s/ David W. Garland
David W. Garland
Counsel for Bloomberg L.P.

CC: All counsel of record via CM/ECF

The request to file the aforementioned documents
under seal and with redactions is GRANTED.

Dated: September 4, 2024
New York, New York

SO ORDERED.



JENNIFER L. ROCHON
United States District Judge